

FILED
Clerk
District Court

OCT 26 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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8 UNITED STATES DISTRICT COURT
9 NORTHERN MARIANA ISLANDS

10 UNITED STATES OF AMERICA,) Criminal Case No. 05-00024
Plaintiff,)
11 v.) GOVERNMENT'S MOTION FOR
SUBSTANTIAL ASSISTANCE
12 STEVEN FAISAO ABAL,) DEPARTURE UNDER U.S.S.G. § 5K1.1
AND 18 U.S.C. § 3553(e)
13 Defendant.)
14

15 COMES NOW the plaintiff, UNITED STATES OF AMERICA, by and through its counsel,
16 Leonardo M. Rapadas, United States Attorney, and Timothy E. Moran, Assistant United States Attorney,
17 and hereby moves the Court, pursuant to United States Sentencing Guidelines § 5K1.1 and 18 U.S.C. §
18 3553(e), to depart from the Sentencing Guidelines and the statutory mandatory minimum consecutive
19 sentence, based on the defendant's substantial assistance to the Government. The Government also
20 moves for a one-level reduction under U.S.S.G. § 3E1.1(b). Pursuant to ¶ 11 of the Plea Agreement
21 between the Government and the defendant, the parties stipulated that the applicable advisory Guidelines
22 level (with applicable reductions) is 21 (37 to 46 months).

23 LEONARDO M. RAPADAS
United States Attorney
Districts of Guam and the NMI

24 Date: 10/26/05

25 By: _____

TIMOTHY E. MORAN
Assistant United States Attorney